

**IN THE UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: JAI ENTERPRISE, LLC  
Debtor**

**CHAPTER 11  
CASE NO. 18-12198-NPO**

**APPLICATION TO EMPLOY ATTORNEYS,  
AND DISCLOSURE OF COMPENSATION**

COMES NOW Jai Enterprise, LLC (the "Debtor") and file this its *Application to Employ Attorneys, and Disclosure of Compensation*, and in support thereof, would show unto the Court the following, to-wit:

1. On June 5, 2018, the Debtor herein filed with this Court its Voluntary Petition for bankruptcy under Chapter 11 of the Bankruptcy Code (the "Petition").

In order to facilitate the prudent performance of its duties and the successful operation of the business under this bankruptcy proceeding, it is necessary for the Debtor to employ legal counsel.

2. The professional services for which said attorneys will be retained to render shall include the following:

- a. To advise and consult with the Debtor regarding questions arising from certain contract negotiations which will occur during the operation of business by the Debtor;
- b. To evaluate and attack claims of various creditors who may assert security interests in the assets and who may seek to disturb the continued operation of the business.
- c. To appear in, prosecute, or defend suits and proceedings, and to take all necessary and proper steps and other matters and things involved in or connected with the affairs of the estate of the Debtor;

- d. To represent the Debtor in court hearings and to assist in the preparation of contracts, reports, accounts, petitions, applications, orders and other papers and documents as may be necessary in this proceeding;
- e. To advise and consult with the Debtor in connection with any reorganization plan which may be proposed in this proceeding and any matters concerning the Debtor which arise out of or follow the acceptance or consummation of such reorganization or its rejection; and
- f. To perform such other legal services on behalf of the Debtor as they become necessary in this proceeding.

3. The Debtor desires to employ the Law Offices of Craig M. Geno, PLLC (the "Law Firm") for the performance of these legal services. The Law Firm, whose offices are in Ridgeland, Mississippi, is fully competent to advise the Debtor on all matters which are anticipated to arise in the functioning of this case and to protect and preserve all rights of the Debtor and the interests of creditors. The Debtor desires to employ said attorneys at the following hourly rates: Craig M. Geno at \$400.00, plus expenses; Associates at \$250.00, plus expenses; and Paralegals/Legal Assistants at \$185.00 per hour, plus expenses. The Debtor has caused the Law Firm to be paid a retainer of \$12,000.00, less pre-petition time, which includes the \$1,717.00 filing fee, to be applied to fees and expenses in this case. Said attorneys will bill at the rates set forth herein and, if necessary, submit requests for compensation to the Court for approval.

2. The Law Firm is now counsel for the Debtor, and as represented in the Affidavit attached hereto as Exhibit "A", it represents no interests adverse to the Debtor or the estate and matters upon which it is to be engaged, and its employment would be in the best interest of this estate. To the best of Debtor's knowledge, the Law Firm has no connection with the creditors herein

or any other party-in-interest or their respective attorneys and accountants, or with the United States Trustee or any employees of the United States Trustee, or with the Chapter 11 Trustee, or any employees of the Chapter 11 Trustee, which are prohibited or would interfere with or hinder the performance of the Law Firm's duties, or which need to be described herein.

WHEREFORE, the Debtor requests that it be authorized to employ and appoint the Law Offices of Craig M. Geno, PLLC as its attorneys and legal counsel, effective June 5, 2018. The Debtor prays for other such general and specific relief as the Court may deem just.

This, the 16<sup>th</sup> day of June, 2018.

Respectfully submitted,

JAI ENTERPRISE, LLC

By Its Attorneys,

LAW OFFICES OF CRAIG M. GENO, PLLC

By: 

Craig M. Geno

OF COUNSEL:

Craig M. Geno; MSB No. 4793  
Jarret P. Nichols; MSB No. 99426  
LAW OFFICES OF CRAIG M. GENO, PLLC  
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**CERTIFICATE OF SERVICE**

I, Craig M. Geno, do hereby certify that I have caused to be served this date, via Notice of Electronic Filing, a true and correct copy of the above and foregoing instrument to:

Christopher J. Steiskal  
Office of the United States Trustee  
[christopher.j.steiskal@usdoj.gov](mailto:christopher.j.steiskal@usdoj.gov)

This, the 14<sup>th</sup> day of June, 2018.

  
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Craig M. Geno

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**EXHIBIT “A”**

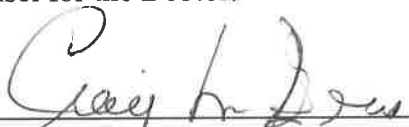
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AFFIDAVIT

PERSONALLY APPEARED BEFORE ME, the undersigned authority, in and for the jurisdiction aforesaid, Craig M. Geno (the "Affiant") of the Law offices of Craig M. Geno, PLLC ("the Law Firm"), attorneys for the Debtor, who after having been by me first duly sworn, stated on oath that this Affidavit is filed herein in support of the Application to Employ Attorneys, and Disclosure of Compensation (the "Application"), that the Law Firm now represents the Debtor, it represents no interests adverse to the Debtor or the estate and matters upon which it is to be engaged, and the Law Firm's employment would be in the best interest of this estate. To the best of Debtor's knowledge, the Law Firm has no connection with the creditors herein or any other party-in-interest or their respective attorneys and accountants, or with the United States Trustee or any employees of the United States Trustee, or with the Chapter 11 Trustee, or any employees of the Chapter 11 Trustee, which are prohibited or would interfere with or hinder the performance of the Law Firm's duties, or which need to be described herein. The Affiant hereby makes application for the employment of the Law Firm as attorneys and legal counsel for the Debtor.

  
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Craig M. Geno

STATE OF MISSISSIPPI  
COUNTY OF Hinds

SWORN TO AND SUBSCRIBED BEFORE ME, this the 14<sup>th</sup> day of June, 2018.



  
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NOTARY PUBLIC